

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS - DALLAS DIVISION

IN RE: § CASE NO. 08-35391-bjh7

BRENT WINSTON ETHUN, SR AND §
STEFANIE MAE ETHUN, § CHAPTER 7

Debtor(s). §

GMAC MORTGAGE, LLC, AS §
SERVICING AGENT FOR §
MORTGAGE ELECTRONIC §
REGISTRATION SYSTEMS, INC., §
SOLELY AS NOMINEE FOR §
COMMUNITY LENDING §
INCORPORATED, its successors and/or §
assigns, §

Movant, §

v.

BRENT WINSTON ETHUN, SR AND
STEFANIE MAE ETHUN; and ROBERT
YAQUINTO, JR., Trustee,

Respondents.

REQUEST FOR SPECIAL NOTICE AND SERVICE
OF PAPERS AND RESERVATION OF RIGHTS

TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTORS, AND ALL INTERESTED
PARTIES

PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for GMAC
Mortgage, LLC, as servicing agent for Mortgage Electronic Registration Systems, Inc., Solely as
Nominee for Community Lending Incorporated, its successors and/or assigns, hereby requests special
notice of all events relevant to the above-referenced bankruptcy and copies of all pleadings or

documents filed in relation to the above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors committees and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy court.

PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master Mailing List in this case, the following address be used:

Tracy D. Mabry
PITE DUNCAN, LLP
4375 Jutland Drive
Suite 200
San Diego, CA 92117

Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party's:

- a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;
- b. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;

c. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved by this party without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: November 13, 2008

PITE DUNCAN, LLP

/s/ Tracy D. Mabry

Tracy D. Mabry, SBOT 24055887

4375 Jutland Drive

Suite 200

San Diego, CA 92117

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Facsimile: (619) 590-1385

ATTORNEYS FOR MOVANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Request for Special Notice on Motion For Relief From Stay of Act Against Property was served on the following parties at the addresses indicated by deposit in the United States Mail, first class postage prepaid and or by electronic notice.

DEBTOR(S)

Brent Winston Ethun, Sr
Stefanie Mae Ethun
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Dallas, TX 75287

DEBTOR(S) ATTORNEY

Theodore Ohmsteade Bartholow, Jr.
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CHAPTER 7 TRUSTEE

Robert Yaquinto, Jr.
509 N. Montclair
Dallas, TX 75208

U.S. TRUSTEE

U.S. Trustee
Department of Justice
1100 Commerce Street
Room 976
Dallas, TX 75242-1496

LIENHOLDER(S)

Linebarger, Goggan, Blair & Sampson, LLC
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/s/Tracy D. Mabry
Tracy D. Mabry, SBOT 24055887
ATTORNEY FOR MOVANT